

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 13-10258-DJC
)	
(1) MARSHALL H. DION,)	
(2) WILLIAM LANDOLFI, a/k/a)	
"Billy," a/k/a "Billy L.," and)	
(3) GLENN FREEMAN,)	
Defendants.)	

UNITED STATES' BILL OF PARTICULARS FOR FORFEITURE OF ASSETS

The United States of America, by and through its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On September 5, 2013, a federal grand jury sitting in the District of Massachusetts returned a four-count Indictment charging the defendants Marshall Dion, William Landolfi, and Glenn Freeman, with Conspiracy to Possess with Intent to Distribute and to Distribute Marijuana, in violation of 21 U.S.C. § 846 (Count One); Possession with Intent to Distribute Marijuana, and Aiding and Abetting, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2 (Counts Two through Four). The Indictment also contained a Forfeiture Allegation, which gave the defendants notice that the United States sought forfeiture, jointly and severally as to Count One, pursuant to 21 U.S.C. § 853, upon conviction of one or more of the offenses alleged in Counts One through Four of the Indictment, of any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses, and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations.

Pursuant to, and without limiting in any manner the Forfeiture Allegation of the Indictment, the United States hereby gives notice that it is seeking forfeiture of, without limitation, the following specific properties:

1. \$19,980 in United States currency, seized on or about July 25, 2013, from TD Bank North Safe Deposit Box 852, located at 457 Broadway, Chelsea, Massachusetts;
2. \$195,001 in United States currency, seized on or about July 17, 2013 from Bank of America Safe Deposit Box 0493000832200Z00245, located at 172 Park Street, North Reading, Massachusetts;
3. various savings bonds, seized on or about July 17, 2013, from Bank of America Safe Deposit Box 049300832200Z00245, located at 172 Park Street, North Reading, Massachusetts;
4. \$3,317 in United States currency, seized on or about July 23, 2013, from 77 Howlett Street, Topsfield, Massachusetts;
5. \$92,000 in United States currency, seized on or about July 23, 2013, from 77 Howlett Street, Topsfield, Massachusetts;
6. \$179,990 in United States currency, seized on or about July 19, 2013, from Chelsea Bank Safe Deposit Box 243, located at 360 Broadway, Chelsea, Massachusetts;
7. \$15,000 in United States currency, seized on or about July 19, 2013, from Chelsea Bank Safe Deposit Box 87, located at 360 Broadway, Chelsea, Massachusetts;
8. \$139,380 in United States currency, seized on or about July 19, 2013, from Chelsea Bank Safe Deposit Box 339, located at 360 Broadway, Chelsea, Massachusetts.
9. various firearms, seized on or about July 23, 2013, from 77 Howlett Street, Topsfield, Massachusetts;
10. various ammunition, seized on or about July 23, 2013, from 77 Howlett Street, Topsfield, Massachusetts;
11. \$325.10 in United States currency, seized on or about July 23, 2013, from 77 Howlett Street, Topsfield, Massachusetts;
12. \$300 in United States currency, seized on or about August 8, 2013, from Marshall Dion;
13. \$6,000 in United States currency, seized on or about August 19, 2013, from TD Bank Safe Deposit Box 927, located at 41 Broadway, Revere, Massachusetts.

Respectfully submitted,

CARMEN M. ORTIZ,
United States Attorney,

By: /s/ Mary B. Murrane
LEAH B. FOLEY
MARY B. MURRANE
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Dated: December 20, 2013

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Mary B. Murrane
MARY B. MURRANE
Assistant U.S. Attorney

Dated: December 20, 2013